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Counsel for Fujikura America, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X-----

	:	Chapter 11
In re	:	Case No. 05-44481 (RDD)
DELPHI CORPORATION, <u>et al.</u> ,	:	(Jointly Administered)
Debtors.	:	

NOTICE OF RECLAMATION DEMAND

PLEASE TAKE NOTICE that pursuant to Section 546(c) of Title 11 of the United States Code, Section 2-702 of the Uniform Commerical Code, applicable state law, and the *Order Under 11 U.S.C. §§ 362, 503, and 546 and Fed. R. Bankr. P. 9019 Establishing Procedures for the Treatment of Reclamation Claims*, dated October 13, 2005 [Dkt. 230], establishing procedures for the treatment of reclamation claims in the bankruptcy cases of the above-captioned debtors and debtors-in-possession (collectively the “Debtors”), Fujikura America, Inc. and certain of their affiliates (collectively “Fujikura”) served on October 14, 2005 written demands for reclamation of goods (the “Reclamation Demands”) upon one or more of the above-captioned Debtors, related entities, and the Debtors’ attorneys of record.

A true and correct copy of the Reclamation Demands are attached hereto as Exhibit 1 and are incorporated by reference for all purposes.

Dated: New York, New York
October 24, 2005

SEYFARTH SHAW LLP

By: /s/ Robert W. Dremluk

Robert W. Dremluk
1270 Avenus of the Americas
New York, New York 10020
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Fax: (212) 218-5526
E-mail: rdremluk@seyfarth.com

Counsel for Fujikura America, Inc.

EXHIBIT 1



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October 14, 2005

VIA FACSIMILE (312) 407-0411
VIA FEDERAL EXPRESS

Ron E. Meisler, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606

Re: RECLAMATION CLAIM OF FUJIKURA AMERICA, INC.

In re Delphi Corporation, et al.
Chapter 11 Bankruptcy Case Nos.: 05-44481 (RDD) (Jointly Administered)
United States Bankruptcy Court, Southern District of New York

Dear Mr. Meisler,

This Firm is counsel to Fujikura America, Inc. ("Fujikura").

On behalf of Fujikura, this is to advise you that, pursuant to Section 2-702 of the Uniform Commercial Code, Section 546(c) of the United States Bankruptcy Code (the "Bankruptcy Code") and the common law, Fujikura hereby requests reclamation of all material (the "Material") received by, and/or delivered to, Delphi Corporation and/or its affiliates ("Delphi"), the above referenced debtors and debtors-in-possession, on or within ten (10) days of the date of this letter or such extended time period as is authorized by the Bankruptcy Code (twenty days). During this time period, Delphi was insolvent. The Material was sold in the ordinary course of Fujikura's business and is believed to have been delivered to Delphi within the statutory time period for a valid reclamation claim.

A copy of the supporting documentation for Fujikura's reclamation claim is attached as Exhibit A and incorporated by reference in this letter.

At this time, we are able to estimate that the aggregate amount of Fujikura's reclamation claim for the time period at issue \$61,514.83. It is possible, however, that Delphi received additional Material from Fujikura during the reclamation time period in excess of this amount. Fujikura will obtain the necessary documentation and information to support this statement through formal discovery in the Bankruptcy Court or otherwise.

ATLANTA BOSTON CHICAGO HOUSTON LOS ANGELES NEW YORK SACRAMENTO SAN FRANCISCO WASHINGTON, D.C. BRUSSELS



Ron E. Meisler, Esq.
October 14, 2005
Page 2

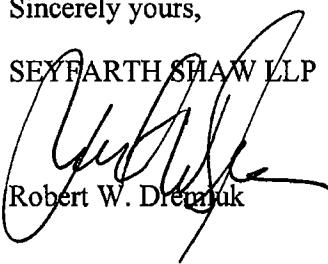
This reclamation demand letter shall not constitute a waiver of any rights, interests, claims, causes of actions, and/or interests under any agreement, at common law, by statute, or in equity, to which Fujikura and Delphi are parties. This letter is intended to serve as Fujikura's written notice that it has made a formal demand for reclamation under state law and as provided in Section 546(c) of the Bankruptcy Code.

In closing, Fujikura will pursue its rights and remedies in law and equity to recover the Material. This may include, among other things, the filing of a reclamation complaint with the Bankruptcy Court and request for a temporary restraining order and preliminary injunction unless we hear from you on or before 12:00 p.m. Eastern Standard Time on October 17, 2005. Furthermore, this reclamation demand letter is without prejudice to Fujikura's right to claim that the Material is owned by Fujikura and has yet to be received by Delphi.

If you have questions with respect to the foregoing, please contact me at (212) 218-5269 or by e-mail at rdremluk@seyfarth.com. If for some reason you cannot reach me, you may also contact my colleague Paul M. Baisier at (404) 885-6715 or at pbaisier@seyfarth.com.

Sincerely yours,

SEYFARTH SHAW LLP


Robert W. Dremluk

Enclosure

cc: Mr. Susumu Sean Watanabe
(Fujikura America, Inc. w/o enclosures)
Paul M. Baisier, Esq.
(Seyfarth Shaw LLP w/o enclosures)



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October 14, 2005

**VIA FACSIMILE (917) 777-2365
VIA EMAIL TMATZ@SKADDEN.COM
VIA HAND DELIVERY**

Thomas J. Matz, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036

Re: **RECLAMATION CLAIM OF FUJIKURA AMERICA, INC.**

In re Delphi Corporation, et al.
Chapter 11 Bankruptcy Case Nos.: 05-44481 (RDD) (Jointly Administered)
United States Bankruptcy Court, Southern District of New York

Dear Mr. Matz,

This Firm is counsel to Fujikura America, Inc. ("Fujikura").

On behalf of Fujikura, this is to advise you that, pursuant to Section 2-702 of the Uniform Commercial Code, Section 546(c) of the United States Bankruptcy Code (the "Bankruptcy Code") and the common law, Fujikura hereby requests reclamation of all material (the "Material") received by, and/or delivered to, Delphi Corporation and/or its affiliates ("Delphi"), the above referenced debtors and debtors-in-possession, on or within ten (10) days of the date of this letter or such extended time period as is authorized by the Bankruptcy Code (twenty days). During this time period, Delphi was insolvent. The Material was sold in the ordinary course of Fujikura's business and is believed to have been delivered to Delphi within the statutory time period for a valid reclamation claim.

A copy of the supporting documentation for Fujikura's reclamation claim is attached as Exhibit A and incorporated by reference in this letter.

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Thomas J. Matz, Esq.
October 14, 2005
Page 2

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If you have questions with respect to the foregoing, please contact me at (212) 218-5269 or by e-mail at rdremluk@seyfarth.com. If for some reason you cannot reach me, you may also contact my colleague Paul M. Baisier at (404) 885-6715 or at pbaisier@seyfarth.com.

Sincerely yours,

SEYFARTH SHAW LLP

Robert W. Dremluk

Enclosure

cc: Mr. Susumu Sean Watanabe
(Fujikura America, Inc. w/o enclosures)
Paul M. Baisier, Esq.
(Seyfarth Shaw LLP w/o enclosures)



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October 14, 2005

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Chicago

Boston

Atlanta

VIA FACSIMILE (917) 777-2350
VIA EMAIL KMARAFIO@SKADDEN.COM
VIA HAND DELIVERY

Kayalyn A. Marafioti, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, New York 10036

Re: RECLAMATION CLAIM OF FUJIKURA AMERICA, INC.

In re Delphi Corporation, et al.
Chapter 11 Bankruptcy Case Nos.: 05-44481 (RDD) (Jointly Administered)
United States Bankruptcy Court, Southern District of New York

Dear Ms. Marafioti,

This Firm is counsel to Fujikura America, Inc. ("Fujikura").

On behalf of Fujikura, this is to advise you that, pursuant to Section 2-702 of the Uniform Commercial Code, Section 546(c) of the United States Bankruptcy Code (the "Bankruptcy Code") and the common law, Fujikura hereby requests reclamation of all material (the "Material") received by, and/or delivered to, Delphi Corporation and/or its affiliates ("Delphi"), the above referenced debtors and debtors-in-possession, on or within ten (10) days of the date of this letter or such extended time period as is authorized by the Bankruptcy Code (twenty days). During this time period, Delphi was insolvent. The Material was sold in the ordinary course of Fujikura's business and is believed to have been delivered to Delphi within the statutory time period for a valid reclamation claim.

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Kayalyn A. Marafioti, Esq.
October 14, 2005
Page 2

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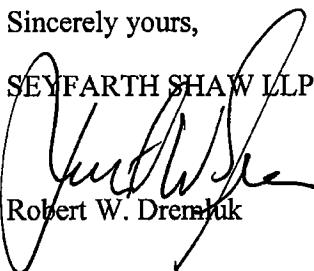
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Sincerely yours,

SEYFARTH SHAW LLP


Robert W. Dremluk

Enclosures

cc: Mr. Susumu Sean Watanabe
(Fujikura America, Inc. w/o enclosures)
Paul M. Baisier, Esq.
(Seyfarth Shaw LLP w/o enclosures)



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October 14, 2005

**VIA FACSIMILE (312) 407-8532
VIA EMAIL JLYONSCH@SKADDEN.COM
VIA FEDERAL EXPRESS**

John K. Lyons, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606

Re: RECLAMATION CLAIM OF FUJIKURA AMERICA, INC.

In re Delphi Corporation, et al.
Chapter 11 Bankruptcy Case Nos.: 05-44481 (RDD) (Jointly Administered)
United States Bankruptcy Court, Southern District of New York

Dear Mr. Lyons,

This Firm is counsel to Fujikura America, Inc. ("Fujikura").

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John K. Lyons, Esq.
October 14, 2005
Page 2

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Sincerely yours,

SEYFARTH SHAW LLP

A handwritten signature in black ink, appearing to read "Robert W. Dremluk". It is positioned over a horizontal line that extends from the end of the "LLP" in the previous line.

Robert W. Dremluk

Enclosure

cc: Mr. Susumu Sean Watanabe
(Fujikura America, Inc. w/o enclosures)
Paul M. Baisier, Esq.
(Seyfarth Shaw LLP w/o enclosures)



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rdremuk@seyfarth.com

October 14, 2005

**VIA FACSIMILE (312) 407-8501
VIA EMAIL JBUTLER@SKADDEN.COM
VIA FEDERAL EXPRESS**

John Wm. Butler, Jr., Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, Illinois 60606

Re: RECLAMATION CLAIM OF FUJIKURA AMERICA, INC.

In re Delphi Corporation, et al.
Chapter 11 Bankruptcy Case Nos.: 05-44481 (RDD) (Jointly Administered)
United States Bankruptcy Court, Southern District of New York

Dear Mr. Butler,

This Firm is counsel to Fujikura America, Inc. ("Fujikura").

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John Wm. Butler, Jr., Esq.
October 14, 2005
Page 2

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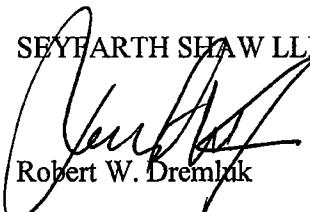
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Sincerely yours,

SEYFARTH SHAW LLP



Robert W. Dremluk

Enclosure

cc: Mr. Susumu Sean Watanabe
(Fujikura America, Inc. w/o enclosures)
Paul M. Baisier, Esq.
(Seyfarth Shaw LLP w/o enclosures)

EXHIBIT A

FAI shipping log 9/27/05 - 10/11/05

P/N	Program	Shipped	Qty	Inv amount	Delivered	Note
52402974	P90	09/27/05	2,760	\$3,229.20	09/28/05	
52409172	GMX	09/30/05	4,080	\$5,100.00	10/03/05	
52409172	GMX	10/05/05	4,080	\$5,100.00	10/05/05	
52409172	GMX	10/06/05	4,080	\$5,100.00	10/07/05	
52409172	GMT	09/27/05	4,080	\$5,100.00	10/05/05	
52409025	Delta	09/30/05	3,960	\$5,385.60	10/04/05	
52406833	Rodman	09/23/05	1,944	\$3,481.70	10/05/05	
52409877	Epsilon	09/29/05	2,430	\$3,341.25	10/06/05	KC
52409877	Epsilon	10/06/05	4,860	\$6,682.50	10/06/05	KC
52409877	Epsilon	10/05/05	2,430	\$3,341.25	10/10/05	Adrian
52409877	Epsilon	10/06/05	2,430	\$3,341.25	10/07/05	Lockport
52408359	229N	09/23/05	2,584	\$3,695.12	TBA	Drop ship ETA 10/13
52405740	329N	09/16/05	6,528	\$8,616.96	10/07/05	Drop Ship

CERTIFICATE OF SERVICE

I hereby certify that, on the 24th day of October 2005, I caused a true and correct copy of the Notice of Reclamation Demand to be served by United States first-class mail to the parties on the attached Service List.

Dated: New York, New York
October 24,2005

/s/ Robert W. Dremluk

SERVICE LIST

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Kaylyn A Marafioti, Thomas J Matz
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Kenji Ito- VP, Larry Khaykin
A w Transmission Eng Aisin Seiki Co
Metro West Industrial Park
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Kenneth S Ziman, Robert H Trust
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JPMorgan Chase Bank NA
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